

**UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to: *Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corporation, et al., Case No. 04 CV 7279*

**DEFENDANTS WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA  
AND WORLD ASSEMBLY OF MUSLIM YOUTH INTERNATIONAL ANSWER  
TO PLAINTIFFS' COMPLAINT<sup>1</sup>**

**BACKGROUND**

1. Defendants are without knowledge or information sufficient to admit or deny the truth of this allegation. Defendants admit only that on September 11, 2001, passenger jet airliners crashed into the World Trade Center Towers in New York.
2. Defendants are without knowledge or information sufficient to admit or deny the truth of this allegation. Defendants admit only that on September 11, 2001, passenger jet airliners crashed into the World Trade Center Towers in New York.
3. Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.
4. Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.
5. Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

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<sup>1</sup> Note that each numbered paragraph in this answer corresponds with and responds to the paragraph in *Euro Brokers, Inc.. v. Al Baraka Investment and Development Corporation* Complaint bearing the same number.

**JURISDICTION**

6. To the extent these allegations are deemed to require a response, they are denied.

**VENUE**

7. To the extent these allegations are deemed to require a response, they are denied.

**PARTIES**

8. Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.
9. Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.
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143. Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

#### **COUNT ONE**

#### **CLAIMS BASED ON TRESPASS**

144. Defendants incorporate their responses to the preceding paragraphs by reference.

145. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants

are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

146. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

147. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

148. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

149. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

150. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

**COUNT TWO**

**CLAIMS FOR PROPERTY DAMAGE AGAINST THE CHARITY AND RELIEF**

**ORGANIZATION DEFENDANTS AND THE BANKING AND FINANCIAL**

**DEFENDANTS FOR AIDING AND ABETTING A VIOLATION OF 18 U.S.C.**

**Section 2331, 2333, et seq. (“Anti-Terrorism Act”)**

151. Defendants incorporate their responses to the preceding paragraphs by reference.
152. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.
153. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.
154. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.
155. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.



156. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

157. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

158. To the extent the allegations implicate Defendants, the allegations are denied. To the extent the allegations implicate other defendants, Defendants are without knowledge or information sufficient to admit or deny the truth of these allegations, therefore the allegations are denied.

**COUNT THREE**

**VIOLATION OF THE RACKETEERING INFLUENCED AND CORRUPT**

**ORGANIZATIONS ACT (“RICO”)**

**18 U.S.C. Section 1962(a)**

159. Defendants incorporate their responses to the preceding paragraphs by reference.

160. This Count was dismissed pursuant to the Court’s Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

161. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

**COUNT FOUR**

**VIOLATION OF THE RACKETEERING INFLUENCED AND CORRUPT**

**ORGANIZATIONS ACT ("RICO")**

**18 U.S.C. Section 1962(c)**

162. Defendants incorporate their responses to the preceding paragraphs by reference.

163. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

164. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

165. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

166. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

167. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

168. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

169. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

**COUNT FIVE**

**VIOLATION OF THE RACKETEERING INFLUENCED AND CORRUPT  
ORGANIZATIONS ACT ("RICO")**

**18 U.S.C. Section 1962(d)**

170. Defendants incorporate their responses to the preceding paragraphs by reference.

171. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

172. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

173. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

174. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

175. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

176. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the

Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

177. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

**COUNT SIX**

**CLAIMS FOR PROPERTY DAMAGE AGAINST THE DEFENDANTS FOR  
VIOLATING INTERNATIONAL LAW**

178. Defendants incorporate their responses to the preceding paragraphs by reference.

179. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

180. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

181. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

182. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

183. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

**COUNT SEVEN**

**CLAIMS FOR PROPERTY DAMAGE AGAINST THE AL QAEDA**

**DEFENDANTS FOR CONSPIRACY**

184. Defendants incorporate their responses to the preceding paragraphs by reference.

185. This Count does not address Defendant, and therefore these paragraphs require no response.

186. This Count does not address Defendant, and therefore these paragraphs require no response.

**COUNT EIGHT**

**CLAIMS FOR PROPERTY DAMAGE AGAINST ALL DEFENDANTS FOR**

**AIDING AND ABETTING**

187. Defendants incorporate their responses to the preceding paragraphs by reference.

188. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

189. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

**COUNT NINE**

**CLAIMS AGAINST ALL DEFENDANTS FOR PUNITIVE DAMAGES**

190. Defendants incorporate their responses to the preceding paragraphs by reference.

191. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

192. This Count was dismissed pursuant to the Court's Order of September 13, 2010, and therefore these paragraphs require no response. To the extent the Count is not dismissed and the allegations implicate Defendants, the allegations are denied.

**PRAYER FOR RELIEF**

Defendants deny that Plaintiffs are entitled to the relief listed in the WHEREFORE clause from Defendants. Defendants are without knowledge or information sufficient to admit or deny whether Plaintiffs are entitled to relief from other defendants.

### **JURY DEMAND**

Plaintiffs' statement regarding jury trial does not require a response.

Each and every averment in Plaintiffs' Complaint that has not been specifically admitted is denied.

### **AFFIRMATIVE DEFENSES**

1. Plaintiffs fail to state a claim upon which relief can be granted.
2. Plaintiffs fail to make any factual allegations against Defendants.
3. This Court does not have personal jurisdiction over Plaintiffs' claims against Defendants.
4. This Court does not subject matter jurisdiction over Plaintiffs' claims against Defendants.
5. There is no causal connection between any of Defendants' activities and Plaintiffs' alleged injuries.
6. No act or omission of any agent, servant, or employee of Defendants proximately caused any harm or damages to Plaintiffs.
7. Plaintiffs fail to adequately allege scienter.
8. Plaintiffs fail to adequately allege proximate cause.
9. Plaintiffs' alleged damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.



10. Defendants are not liable for Plaintiffs' damages based on the doctrines of several liability and/or combined or comparative fault pursuant to N.Y. C.P.L.R. Section 1601 et seq.
11. This Court is not proper venue for Plaintiff' claims against Defendants.
12. Plaintiffs have waived their claims based on the doctrine disallowing double-recovery.
13. Plaintiffs have waived their claims based on the collateral source doctrine.
14. Plaintiffs have waived their claim based on the doctrine of equitable subrogation.
15. Plaintiffs' claims are barred to the extent that they failed to mitigate damages.
16. Plaintiffs have waived their claims against Defendants.
17. Plaintiffs' claims have been waived to the extent that certain Plaintiffs are seeking recovery against Defendants for the same or similar claims in other actions comprising the multi-district litigation entitled *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (RCC), pending the United States District Court for the Southern District of New York.
18. Plaintiffs' state-law claims are pre-empted by federal law.
19. Plaintiffs' claims are barred based on principles of International Comity.
20. Plaintiffs' claims are barred by the doctrines of laches.
21. Plaintiffs' claims are barred by the doctrine of election of remedies.
22. Plaintiffs' claims are barred by Political Question doctrine.
23. Plaintiffs' claims are barred based on Sovereign Immunity.
24. Plaintiffs' claims are barred by the Act of State doctrine.

25. Plaintiffs have released their claims against Defendants.
26. Plaintiffs have discharged their claims against Defendants.
27. Plaintiffs' claims are barred by the doctrine of compromise and settlement.
28. Plaintiffs are precluded from asserting their claims by the doctrine of res  
judicata.
29. Plaintiffs are precluded from asserting their claims by the doctrine of  
collateral estoppel.
30. Plaintiffs lack standing to pursue their claims against Defendants.
31. Plaintiffs' claims are barred by the statute of limitations.
32. Plaintiffs are estopped from receiving the relief requested against Defendants.
33. Plaintiffs' claims are barred to the extent that they violate Defendants' right to  
Due Process.
34. Plaintiffs' claims are invalid in light of workers' compensation laws,  
regulations, rules and case law.
35. Plaintiffs' claims for punitive damages against Defendants are invalid because  
Defendants' activities as alleged by Plaintiffs, were not committed with intent,  
malice and outrageous conduct aggravated by evil motive, or reckless  
indifference and none of Defendants' activities in any way were intended to,  
or did harm, the Plaintiffs in this action.
36. Defendants intend to invoke all other defenses, including affirmative defenses,  
that become apparent in the future (including through discovery) and reserve  
the right, in accordance with the Federal Rules of Civil Procedure and the

Local Rules of the United States District Court for the Southern District of  
New York, to assert such defenses at a later point in time.

Dated: October 15, 2010

Respectfully submitted,

/s/Omar T. Mohammedi

Omar T. Mohammedi, Esq.

Law Firm of Omar T. Mohammedi, LLC

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233 Broadway, Suite 801

New York, NY 10279

*Attorneys for World Assembly of Muslim Youth*

*Saudi Arabia and World Assembly of Muslim Youth*

*International*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2010, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 of June 16, 2004.

/s/Omar T. Mohammedi  
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*Attorneys for World Assembly of Muslim Youth  
Saudi Arabia and World Assembly of Muslim Youth  
International*